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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

\* \* \*

|                           |   |                            |
|---------------------------|---|----------------------------|
| UNITED STATES OF AMERICA, | ) | <b>2:15-cr-017-JAD-VCF</b> |
|                           | ) |                            |
| Plaintiff,                | ) |                            |
|                           | ) |                            |
| v.                        | ) |                            |
|                           | ) |                            |
| RAYCHELLE IVORY,          | ) |                            |
|                           | ) |                            |
| Defendant.                | ) |                            |
| _____                     | ) |                            |

**STIPULATION FOR EXTENSION OF TIME**

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Phillip N. Smith, Jr., Assistant United States Attorney, counsel for the United States of America, and Heidi A. Ojeda, Assistant Federal Public Defender, counsel for Defendant RAYCHELLE IVORY, that the date for the Government to file a response to the Defendant's Motion to Suppress Evidence (Docket #37) be extended for seven (7) days.

This stipulation is entered for the following reasons:

1. The Defendant's Motion was filed and served on May 1, 2015. PACER set the Government's Response deadline for May 18, 2015. Due to the press of business, Government counsel needs additional time to research the issues presented in the Defendant's Motion and to draft an appropriate response.

1           2.     The Defendant is incarcerated, but he does not object to the continuance of the  
2 Government's response deadline.

3           3.     The additional time requested herein is not sought for purposes of delay, but  
4 merely to allow the Government enough time to research and draft an appropriate response.

5           4.     Additionally, denial of this request for continuance could result in a miscarriage  
6 of justice.

7           5.     This is the first stipulation filed herein to continue the Government's response  
8 deadline.

9           DATED: May 14, 2015.

10  
11           \_\_\_\_\_  
12           /s/  
13           PHILLIP N. SMITH, JR.  
14           Assistant United States Attorney  
15           Counsel for the United States

16  
17           \_\_\_\_\_  
18           /s/  
19           MONIQUE KIRTLEY  
20           Assistant Federal Public Defender  
21           Counsel for Defendant RAYCHELLE IVORY

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

\* \* \*

UNITED STATES OF AMERICA, ) **2:15-cr-017-JAD-VCF**  
)  
Plaintiff, )  
)  
v. )  
)  
RAYCHELLE IVORY, )  
)  
Defendant. )  
\_\_\_\_\_)

**FINDINGS OF FACT**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. The Defendant's Motion was filed and served on May 1, 2015. PACER set the Government's Response deadline for May 18, 2015. Due to the press of business, Government counsel needs additional time to research the issues presented in the Defendant's Motion and to draft an appropriate response.

2. The Defendant is incarcerated, but he does not object to the continuance of the Government's response deadline.

3. The additional time requested herein is not sought for purposes of delay, but merely to allow the Government enough time to research and draft an appropriate response.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

5. This is the first stipulation filed herein to continue the Government's response deadline.

For all of the above-stated reasons, the ends of justice would best be served by a continuance of the motion response deadline.

